

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

LAYLA FAKHR EL-DIN EL-SAWY,
an individual, and EGYPTIAN
EUROPEAN PHARMACEUTICAL
INDUSTRY, an Egyptian corporation,

Case No. 20-13409-CV
Hon. Laurie J Michelson

Plaintiffs,

v.

MARK L. DAY

Defendant.

The Miller Law Firm, P.C.
E. Powell Miller (P39487)
Kevin F. O'Shea (P40586)
Daniel L. Ravitz (P83031)
950 W. University Drive, Suite 300
Rochester, MI 48307
(248) 841-2200
epm@millerlawpc.com
kfo@millerlawpc.com
dlr@millerlawpc.com
Attorneys for Plaintiffs

Deloof Dever Eby Wright Milliman
Bourque & Issa, PLLC
Thomas B. Bourque (P46595)
301 N. Main Street, 2nd Floor Ann
Arbor, MI 48104
(734) 769-2691
(734) 994-0206 fax
tbourque56@gmail.com
Attorney for Defendant

**JOINT MOTION TO EXTEND SCHEDULED DATE
FOR FILING DISPOSITIVE MOTIONS**

Plaintiffs, Layla Fakhr El-Din El-Sawy and Egyptian European
Pharmaceutical Industry, and Defendant, Mark Day, state as follows for their Joint
Motion to Extend Scheduled Date for Filing Dispositive Motions:

1. This Court previously set a due date for dispositive motions of January 30, 2023. (*See* Text-Only Order dated 11/15/22, granting parties' Joint Motion to Extend Scheduling Order and Permitting Defendant to File Separate Summary Judgment Motions (ECF No. [29]))

2. The parties are actively pursuing a settlement of this matter.

3. The parties believe that an extension of the dispositive motion filing date to March 24, 2023 will allow sufficient time to pursue settlement.

4. There are no dates presently set for any pretrial orders, pretrial conferences, motions *in limine*, or trial.

5. The extension sought does not prejudice any party and will permit the parties to pursue a settlement without expending time and resources on summary judgment briefing that may well prove unnecessary.

WHEREFORE, the parties jointly request that the Court extend the date for filing dispositive motion for sixty days, until **March 24, 2023**.

Respectfully submitted,

The Miller Law Firm, P.C.

Deloof Dever Eby Wright Milliman
Bourque & Issa, PLLC

/s/ Kevin F. O'Shea

E. Powell Miller (P39487)
Kevin F. O'Shea (P40586)
Daniel L. Ravitz (P83031)
950 W. University Drive, Suite 300
Rochester, MI 48307
(248) 841-2200

/s/ Thomas B. Bourque

Thomas B. Bourque (P46595)
301 N. Main Street, 2nd Floor Ann
Arbor, MI 48104
(734) 769-2691
tbourque56@gmail.com
Attorney for Defendant

epm@millerlawpc.com
kfo@millerlawpc.com
dlr@millerlawpc.com
Attorneys for Plaintiffs

Dated: January 18, 2023

PROOF OF SERVICE

The undersigned certifies that a copy of the above document was served upon the attorney(s) of record of all the party(ies) in this action by serving same at the business address(es) as disclosed by the pleading of record herein on January 18, 2023 by electronic filing via the Court's ECF system.

/s/ Kevin F. O'Shea